

October 11, 2011

By Electric Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Williams Sound Corp. Petition for Declaratory Ruling,
ET Docket No. 10-26**

Dear Ms. Dortch,

I am writing this comment in support of the William's Sound Corporation's Petition for Declaratory Ruling requesting FCC clarification of the definition of "auditory assistance device" that would permit part 15 auditory devices that operate in the 72-76 MHz bands to be used by anyone at any location for simultaneous language interpretation.¹

Expanding the use of these devices to the general population is necessary now more than ever. With the increase of international immigrants, there are people from many different diverse backgrounds and languages. Some of these people are hard of hearing and will need some sort of hearing aid; furthermore not all will understand the English language perfectly. It is necessary to increase the availability of such devices so that more people may benefit from their usefulness.

The Survey of Income and Program Participation (SIPP) estimates that close to 10,000,000 people are hard of hearing and about 1,000,000 are functionally deaf. It can easily be assumed that not all of these people use English as their primary language. If these devices can be distributed to the general population, including those that are considered handicapped, many people will benefit. The proposed rule states that spoken words can be translated in "continuously near real time" and that these devices are an improvement over more conventional ways of amplifying sound, such as loudspeakers, due to their "minimizing the disproportionate effects of background noise and reverberation on speech perception."

There are many instances in which a person needing an auditory assistance device may need simultaneous translation as well. Although the SIPP estimates that only 4 percent of the hard of hearing or deaf are under the age of 18, this leaves about 450,000 children who may need translation services especially in the educational

¹ See FCC Public Notice, *Office Of Engineering And Technology Declares The Williams Sound Corporation Petition For Declaratory Ruling Regarding Part 15 Auditory Assistance Devices In The 72-76 MHz and 902-928 MHz Bands to be a "Permit-But-Disclose" Proceeding For Ex Parte Purposes and Requests Comments*, ET Docket No. 10-28, DA No. 10-129 (Jan. 26, 2010), erratum rel. Jan. 29, 2010, to change the docket number to ET Docket No. 10-26.

sector. There are many school programs, such as English for Speakers of Other Languages (ESOL) that would not be possible with effective translation methods. If these auditory assistance devices are provided to children that need them, a greater number of people will be able to benefit from such programs. The benefits for our nation's youth continue in such places as church, youth groups, and other extracurricular settings.

Students at the collegiate or technical level may also benefit from the expansion of the auditory assistance devices. There are instances in which students have the opportunity to attend import hearings, speeches, or events that may further their education and careers. Some may be discouraged due to their lack of ability to hear, which in most cases is accounted for by normal auditory assistance devices, but even more so by their inability to understand the language well. With the implementation of near real time translation, their worries may be lifted.

It is understandable that some may oppose this proposed rule, especially those in control of the auditory assistance devices market currently. This proposed rule will allow other competitors to develop their own devices. Fortunately for the hearing impaired and deaf, this competitiveness will only lead to better available auditory assistance devices, and more affordable prices as usually happens in markets when the amount of suppliers increases.

I can also see, tremendous room for technological advances in the use of these auditory assistance devices. For example, making these devices compatible with television programs, or even computer programs, so that people may benefit from their devices everywhere they go. I believe this advancements are possible if they are given time to develop. If so, we may be looking at a revolutionary period in technology in which subtitles for the hearing impaired can be replaced by actual auditory means of translation.

Aside from all the benefits to the hearing impaired and deaf, all applicable benefits would also be available to people without this disability, but rather to those that are visually impaired or blind. These auditory assistance devices have the capability of helping those struggling with the English language, due to their lack of sight, to have an aid in translating it as they strive to learn it.

The proposed rule also seeks to expand the use of these devices to people that have no impairments or disabilities at all as well. This would greatly assist in "facilitating public access to telecommunications technologies." There would be a decrease in conflicts over simple misunderstandings. While people who are striving to learn the English language do so, they have a way of understanding it along the way. I believe it is a tremendous benefit for people that have trouble with English to be able to understand what is being said just as well as someone that understands the English language perfectly.

People without the need of these devices would also benefit since there would no longer be a need for interpreter to speak out loud during presentations. The auditory experience would be enhanced for all people involved.

All in all, I am in support William's Sound Corporation's Petition for Declaratory Ruling requesting FCC clarification of the definition of "auditory assistance device" that would permit part 15 auditory devices that operate in the 72-76 MHz bands to be used by anyone at any location for simultaneous language interpretation. I can

see only good things coming from this and many people, not only those that are hearing impaired or deaf, benefiting as a result of this simple change.

Sincerely,

Rodrigo Tranamil
The George Washington University
Political Science and Psychology Student